

**To:** Smith, Claudia[Smith.Claudia@epa.gov]; Gilbert, Alexas[Gilbert.Alexas@epa.gov]  
**Cc:** Matichuk, Rebecca[Matichuk.Rebecca@epa.gov]; Razzazian, Christopher[Razzazian.Christopher@epa.gov]; Beeler, Cindy[Beeler.Cindy@epa.gov]  
**From:** Tonnesen, Gail  
**Sent:** Tue 10/13/2015 2:23:58 PM  
**Subject:** RE: VOC tpy reduced

Alexas, Claudia,

One more question - do you have an estimate of the total uncontrolled emissions? I want to include a statement on how the FIP VOC reductions compare to total basin OG emissions. I added up the NEI totals for each county below, and the FIP would be a 59% reduction in VOC emissions, however, the NEI is likely biased low by 3x or 4x, so the NEI total VOC emissions might differ from your estimate.

thanks,

Gail

FIP VOC                    63721.0  
reductions  
County NEI VOC

tons per year

Duchesne	34370.7
Uinta	67050.6
Carbon	3774.2
Emery	434.1
Grand	1906.0
Wasatch	0.0
Utah	3.2
Total UB	107538.8
% VOC Reduction	59.3%

**From:** Smith, Claudia  
**Sent:** Friday, October 09, 2015 9:57 AM  
**To:** Tonnesen, Gail  
**Cc:** Gilbert, Alexas  
**Subject:** RE: VOC tpy reduced

We are working with two different definitions of the Uinta Basin:

WRAP defines Uinta Basin as wholly including the counties of Carbon, Duchesne, Emery, Grand, Uintah and Wasatch.

EPA in the GHG Reporting Program defines Uinta Basin as the counties of Carbon, Daggett, Duchesne, Uintah and Wasatch.

We would be looking only at the counties that the Uintah and Ouray Indian Reservation cover portions of, which according to Wikipedia are: Uintah, Duchesne, Wasatch, Grand, Carbon, Utah, and Emery counties, but I am waiting to hear back from ORC on the official legally defensible answer. Since neither definition includes Utah county, I think for now you can go with Uintah, Duchesne, Wasatch, Grand, Carbon, and Emery counties.

Claudia

**From:** Tonnesen, Gail  
**Sent:** Friday, October 09, 2015 9:36 AM  
**To:** Smith, Claudia  
**Subject:** FW: VOC tpy reduced

Hi Alexas, Claudia,

Which counties are included in the FIP?

thanks,

Gail

**From:** Gilbert, Alexas  
**Sent:** Thursday, October 01, 2015 4:20 PM  
**To:** Tonnesen, Gail  
**Subject:** VOC tpy reduced

Hi Gail,

Here are some preliminary numbers coming out of the cost analysis.

At 98% control we are looking at controlling 62,327 VOC tpy.

Additionally, the rule will incorporate a leak detection program using OGI and we are estimating a reduction of 1,374 VOC tpy thru that program.

The numbers are subject to change as we refine our analysis but it's a good place to start.

Thanks-

Alexas

